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LETTER FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION REGARDING REVIEW OF FINAL FOCUSED FEASIBILITY STUDY OPERABLE UNIT 13 NAS PENSACOLA FL
9/13/2000
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Department of Environmental Protection

Jeb Bush
Governor

Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

September 13, 2000

Mr. Bill Hill
Code 1851
Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive
P.O. Box 190010
North Charleston, South Carolina 29419-9010

RE: Final Focused Feasibility Study, Operable Unit 13, NAS Pensacola

Dear Mr. Hill:

I have completed the technical review of the above referenced document dated May 3, 2000 (received May 5, 2000). Attached are comments from Jorge Caspary. His comments should be considered during preparation of the final ROD and development of the groundwater monitoring plan. The document presents a reasonable range of alternatives for risk managers to consider for remediation at the site. I have the following minor comments that should be addressed as replacement pages in the final document.

1. Page 2-10 and Table 2-5, RGs for Groundwater: The reference concentration (RC) for Antimony should not be used since it is based on an elevated detection limit in the background samples. I recommend using the Florida Primary Drinking Water Standard (FPDWS) for Antimony of 6 ug/L.

2. Page 3-13, Table 3-2, Soil Technology Screening for Operable Unit 13: There is a typographical error in the last sentence in the column labeled Implementability. Please change "was" to waste.

3. Page 3-22, Natural Attenuation: There is a typographical error in the first sentence. Please change "forma" to formal.

4. Page 5-9, 5-11, 5-20, and 5-21: There are several typographical errors (=s) that should be corrected on these pages.

5. Appendix A, Table A-1, Summary of Potential Chemical Specific ARARs: Florida Soil Cleanup Goals were promulgated August 5, 1999 in Chapter 62-777.

6. Appendix B: Page xiv of the executive summary should be removed from the Response to Comments Section.

If I can be of any further assistance with this matter, please contact me at (850) 921-9989.

Sincerely,

Joseph F. Fugitt

Joseph F. Fugitt, P.G.
Remedial Project Manager

cc: Ron Joyner, NAS Pensacola
Gena Townsend, USEPA Region 4
Brian Caldwell, EnSafe, Knoxville
Allison Harris, EnSafe, Memphis
Claire Barnett, Ensafe, Memphis
Terry Hansen, Tetra Tech NUS, Inc., Tallahassee
Charlie Goddard, FDEP Northwest District

TJB _____ JJC _____ ESN _____

TO: Joe Fugitt, P.G.

FROM: Jorge R. Caspary P.G. JRC

DATE: September 13, 2000

SUBJECT: Focused Feasibility Study Report for OU-13. NAS Pensacola.

I have reviewed the above referenced document. Since staff previously commented on this document (correspondence dated July 7, 1998), I have limited my review to the answers provided to our earlier review comments.

In general, the Focused Feasibility Study is adequate for its purpose. Since it appears previous and current Tier I teams have narrowed the choices of remedial technologies to a few presumptive choices, a focused document makes sense. I do also concur that the document presents a reasonable range of alternatives for risk managers to consider as well as balance cost tradeoffs.

From the responses provided, it appears that the Remedial Investigation Addendum (1999) for OU-13 provides empirical data to support natural attenuation of inorganics particularly, cadmium. I trust that this is true. Further, the Navy's consultant recommends collecting natural attenuation data as part of the presumptive long-term groundwater monitoring program. As in the case of Naval Air Station Jacksonville, this is generally acceptable and has been implemented at other installations in order to move the process along. However, in the case of expected long-term exceedances of departmental standards, it has also been customary to develop a contingency in decision documents to evaluate more aggressive remedial techniques if projected natural attenuation timeliness in the fate and transport model are not met by the monitoring program. While natural attenuation of inorganics can occur if the conditions are amenable for this process to take place, previous discussions with our supervisors and Division Director indicate that it is unlikely the Department will accept long-term exceedances of its standards if field results do not meet estimated natural attenuation time frames. I recommend your team discuss this as part of the proposed plan and subsequent decision document.

The remainder of the responses discusses the soil leachability issue. The discussion presented in the FFS is adequate for its purpose and the response to our earlier comment on this issue appears to be adequate. It seems that the selected alternative will provide adequate control over leachability issues particularity in light of the proposed groundwater-monitoring program, institutional controls, and projected use of the site.

Please contact me if you have any questions

C: Greg Brown